

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Lubrizol Corporation
155 Freedom Road
Painesville, OH 44077

ATTENTION:

Kenneth Frato
EHS&S Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Lubrizol Corporation (Lubrizol or you) to submit certain information about the facility at 155 Freedom Road, Painesville, OH 44077. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Lubrizol owns and operates an emission source at the Painesville, OH facility. We are requesting this information to determine whether your emission source is complying with its CAA permits, the Ohio State Implementation Plan, the New Source Performance Standards, and the National Emission Standards for Hazardous Air Pollutants.

Lubrizol must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Lubrizol must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

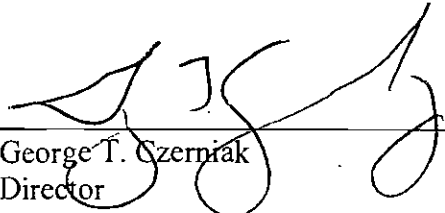
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Lubrizol to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Greg Gehrig at (312) 886-4434.

Date

11/6/14


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B. **If the question requests numeric data, please provide this data in a Microsoft Excel format or similar.**
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in

image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Lubrizol Corporation must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Facility diagram showing processes and associated air pollution control equipment and stacks permitted by the Ohio Environmental Protection Agency (Ohio EPA) in CAA Title V Operating Permit issued on April 18, 2007 (Permit) and subsequent Permits-to-Install. The diagram shall also show significant features at the facility including walls, roadways, and building openings.
2. Pertaining to the New Source Performance Standards (NSPS) Subpart III, Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes at 40 C.F.R. Part 60 (NSPS Subpart III):
 - a. Does the facility operate any air oxidation reactors? If so, please specify the process.
 - b. If the facility operates any air oxidation reactors, were these air oxidation reactors constructed, reconstructed, or modified prior to October 21, 1983? If so, please specify the reactors and the date(s) of construction, reconstruction, or modification.
 - c. If the facility operates any air oxidation reactors, does it produce any of the chemicals listed in 40 C.F.R. §60.617? If so, please specify the process and chemical(s) and how compliance is achieved with Subpart III.
 - d. If the facility answers yes to the questions 2.a, b, and c above, does the exemption in 40 C.F.R. §60.610(c) apply? If so, please explain and provide supporting documentation.
3. Pertaining to NSPS Subpart RRR, Standards of Performance for VOC Emissions from SOCMI Reactor Processes at 40 C.F.R. Part 60:
 - a. Does the facility operate any reactors? If so, please specify the reactors and the process.
 - b. If the facility operates any reactors, were these reactors constructed, reconstructed, or modified prior to January 21, 1990? If so, please specify the reactors and the date(s) of construction, reconstruction, or modification.
 - c. If the facility operates any reactors, does it produce any of the chemicals listed in 40 C.F.R. §60.707? If so, please specify the process, the chemical(s), and how compliance is achieved with NSPS Subpart RRR.
 - d. If the facility answers yes to the questions 3.a, b, and c above, do any of the exemptions in 40 C.F.R. §60.700(c) apply? If so, please explain and provide supporting documentation.

4. Pertaining to NSPS Subpart VV, Standards of Performance for Equipment Leaks of VOC in SOCMIs for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, at 40 C.F.R. Part 60:
 - a. Does the facility operate any affected facilities that commenced construction, reconstruction, or modification after January 5, 1981, and on or before November 7, 2006, as described in 40 C.F.R. §60.480? If so, please specify these affected facilities at Lubrizol, the date(s) of construction, reconstruction, or modification, and how compliance is achieved with NSPS Subpart VV.
 - b. If the facility operates one or more affected facilities, does the facility claim one or more exemptions per 40 C.F.R. §60.480(d)? If so, please list the exemption and the applicable affected facility.
5. Pertaining to NSPS Subpart VVa, Standards of Performance for Equipment Leaks of VOC in SOCMIs for which Construction, Reconstruction, or Modification Commenced After November 7, 2006, at 40 C.F.R. Part 60:
 - a. Does the facility operate any affected facilities that commenced construction, reconstruction, or modification after November 7, 2006, as described in 40 C.F.R. §60.480a? If so, please specify these affected facilities at Lubrizol and how compliance is achieved with NSPS Subpart VVa.
 - b. If the facility operates one or more affected facilities, does the facility claim one or more exemptions per 40 C.F.R. §60.480a(d)? If so, please list the exemption and the applicable affected facility.
 - c. Does the facility choose to comply with NSPS Subpart VVa in lieu of compliance with NSPS Subpart VV per 40 C.F.R. §60.480(e)(2)?
6. Pertaining to NSPS Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, at 40 C.F.R. Part 60:
 - a. Does the facility operate any affected facilities (i.e. petroleum storage tanks) according to the applicability criteria in 40 C.F.R. §60.110?
 - b. If the facility operates one or more affected facilities, please specify these affected facilities at Lubrizol, the date(s) of construction, reconstruction, or modification, and how compliance is achieved with NSPS Subpart K.
7. Pertaining to NSPS Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, at 40 C.F.R. Part 60:
 - a. Does the facility operate any affected facilities (i.e. petroleum storage tanks) according to the applicability criteria in 40 C.F.R. §60.110a?
 - b. If the facility operates one or more affected facilities, please specify these affected facilities at Lubrizol, the date(s) of construction, reconstruction, or modification, and how compliance is achieved with NSPS Subpart Ka.

8. Pertaining to NSPS Subpart Kb, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, at 40 C.F.R. Part 60:
 - a. Does the facility operate any affected facilities (i.e. petroleum storage tanks) according to the applicability criteria in 40 C.F.R. §60.110b?
 - b. If the facility operates one or more affected facilities, please specify these affected facilities at Lubrizol, the date(s) of construction, reconstruction or modification, and how compliance is achieved with NSPS Subpart Kb.
9. Pertaining to the National Emissions Standards for Hazardous Air Pollutants Subpart VVVVVV for Chemical Manufacturing Area Sources at 40 C.F.R. Part 63 (NESHAP Subpart VVVVVV):
 - a. List the chemical manufacturing process units (CPMUs) and associated HAPs at the facility.
 - b. Provide the notification of compliance status per 40 C.F.R. §63.11501(b).
 - c. Provide all records kept per 40 C.F.R. §63.11501(c).
 - d. Provide the semiannual compliance reports per 40 C.F.R. §63.11501(d).
 - e. Provide all additional records and reports per 40 C.F.R. §63.9 and §63.10 (per Table 9 of the NESHAP Subpart VVVVVV).
10. From January 1, 2011, to the present, provide the following information for the fume incinerators AC-6 and AC-7:
 - a. Temperature logs.
 - b. Periods when emissions were vented to the thermal incinerators.
 - c. Periods when emissions were vented to the thermal incinerators and the recorded temperature was below 1600 °F.
 - d. Performance tests. If no performance test has been conducted since January 1, 2011, provide the most recent test for each incinerator.
11. From January 1, 2011, to the present, provide the following information for any and all caustic scrubbers used for pollution control:
 - a. pH of the scrubber liquor.
 - b. Scrubber liquor flow rate.
 - c. Operating pressure drop.
 - d. Performance tests. If no performance test has been conducted since January 1, 2011, provide the most recent test for each scrubber.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.